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October 30, 1998

To: John O'Grady
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson
Chicago, Illinois 60604

From: Raghavender Nagam
START Project Manager

Subject: Comments on CEI's revised Site Investigation Work Plan for Vacant
Lot/Pansteel dated October 1998

Dear John:

I have reviewed CEI's revised Site Investigation Work Plan and their cover letter. The following are my comments.

Please call me if you have any questions.

Sincerely,

Raghu Nagam
(Raghavender Nagam)

EPA Region 5 Records Ctr.



229891

General Comment #3

- Table One in Attachment B still does not include polycyclic aromatic hydrocarbon (PAH) analysis for soil samples. In my September 29, 1998, memorandum to U.S. EPA, I suggested that soil samples be analyzed for PAH compounds. Denzo pyrene was one of the compounds that was above our risk assessment criteria. I don't have U.S. EPA copy of the letter sent to CEI to know if this analysis was requested.

Specific Comment #11

- This is regarding CEI's response to U.S. EPA's request to include site remediation objectives. CEI is using TACO remediation objectives. For compounds where TACO remediation objectives are not given, CEI proposed to use detection level of the compound as the action level and would consult IEPA office of Chemical Safety to gather information and guidance for establishing remediation objectives. For evaluating remediation objectives for such compounds, a human health and ecological risk-based assessment should be conducted. This kind of evaluation is also the basis for TACO remediation objectives.